

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

STATE OF TENNESSEE, AND
COMMONWEALTH OF VIRGINIA,

Plaintiffs,

v.

No. 3:24-cv-33

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,

Defendant.

DECLARATION OF CAMERON T. NORRIS

I, Cameron T. Norris, pursuant to 28 U.S.C. §1746, declare the following:

1. I am over eighteen years of age, have personal knowledge of the facts stated herein, and if called upon to do so, could and would testify competently thereto. I am an attorney at Consovoy McCarthy PLLC representing the Plaintiffs in the above-styled action.

2. As part of my duties, I took part in preparing the Motion for a Temporary Restraining Order and Preliminary Injunction, and related filings in the above-captioned case.

3. Plaintiffs' motion relies, in part, on declarations and other pieces of documentary evidence attached to the motion as exhibits.

Exhibit Authentication

1. I certify that each declaration and additional documentary exhibit is a true and correct copy as described herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Declaration of Dr. Daniel J. White, Vice Chancellor and Director of Athletics at the University of Tennessee, Knoxville, executed January 29, 2024.

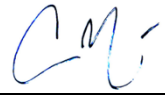
3. Attached hereto as **Exhibit B** is a true and correct copy of the Declaration of James Clawson, Co-Founder and CEO of The Volunteer Club and Spyre Sports Group, LLC and founding member of the Collective Association, executed January 30, 2024.

4. Attached hereto as **Exhibit C** is a true and correct copy of the Declaration of Andrew D. Schwarz, member of OSKR, LLC, executed January 30, 2024.
5. Attached hereto as **Exhibit D** is a true and correct copy of Wright, *Division I Council Approves NIL Disclosure and Transparency Rules*, NCAA (Jan. 10, 2024), available online at perma.cc/C5YQ-LHGL.
6. Attached hereto as **Exhibit E** is a true and correct copy of Wright, *NIL-Related Recruiting Violation Occurred in Florida State Football Program*, NCAA (Jan. 11, 2024), available online at perma.cc/58PD-88Z6.
7. Attached hereto as **Exhibit F** is a true and correct copy of Letter from Chancellor Plowman to President Baker (Jan. 29, 2024), available online at perma.cc/ZK4H-4LBJ.
8. Attached hereto as **Exhibit G** is a true and correct copy of *NLI Signing Dates*, Nat'l Letter of Intent (2023), available online at perma.cc/3RSH-PNRQ.
9. Attached hereto as **Exhibit H** is a true and correct copy of *Division I 2023-24 Manual*, NCAA (Aug. 5, 2023), available online at perma.cc/2W7D-ATX5.
10. Attached hereto as **Exhibit I** is a true and correct copy of *January 2024 NCAA Division I Council-Governance Publication of Proposed Legislation* (Dec. 5, 2023), available online at perma.cc/3HK5-TF3X.
11. Attached hereto as **Exhibit J** is a true and correct copy of *Our Three Divisions*, NCAA (2024), available online at perma.cc/4E9D-Z3UD.
12. Attached hereto as **Exhibit K** is a true and correct copy of *NCAA Consolidated Financial Statements*, NCAA (Dec. 12, 2022), available online at perma.cc/5ZEH-7FQ9.
13. Attached hereto as **Exhibit L** is a true and correct copy of *Interim NIL Policy*, NCAA (July 1, 2021), available online at perma.cc/FFM3-KCUE.

14. Attached hereto as **Exhibit M** is a true and correct copy of *Name, Image and Likeness Policy Question and Answer*, NCAA (Feb. 2023), available online at perma.cc/4QJ4-R332.
15. Attached hereto as **Exhibit N** is a true and correct copy of *NIL Guidance Memo.*, NCAA (June 27, 2023), available online at perma.cc/NVP9-P842.
16. Attached hereto as **Exhibit O** is a true and correct copy of *Our Division I Members*, NCAA (2024), available online at perma.cc/8C6S-XGCB.
17. Attached hereto as **Exhibit P** is a true and correct copy of *NCAA Division I Transfer Windows*, NCAA (Oct. 2023), available online at perma.cc/F9A3-YKBN.
18. Attached hereto as **Exhibit Q** is a true and correct copy of *How Long will the Transfer Portal be Open for Michigan, Alabama, Washington Players?*, Sporting News (Jan. 24, 2024), available at perma.cc/9YLB-XMUV.
19. Attached hereto as **Exhibit R** is a true and correct copy of *The Value of College Sports*, NCAA (Jan. 3, 2014), available online at perma.cc/P2GK-FVA9.
20. Attached hereto as **Exhibit S** is a true and correct copy of *Negotiated Resolution, Florida State Case No. 020169*, NCAA (Jan. 12, 2024) available online at perma.cc/NXL5-8LE5.
21. Attached hereto as **Exhibit T** is a true and correct copy of *Florida is Under NCAA Investigation a Year After a Failed NIL Deal with QB Signee Jaden Rashada*, CBS News (Jan. 20, 2024), available online at perma.cc/9CE8-CNFQ.
22. Attached hereto as **Exhibit U** is a true and correct copy of *Raynor & Navarro, Recruiting Confidential: High School Football Stars Dish on NIL Deals, Arrogant Coaches and More*, The Athletic (Jan. 3, 2024).

Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 31, 2024 in Knoxville, Tennessee.

/s/ 
Cameron T. Norris (TN Bar # 33467)
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